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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RICHARD ZEITLIN, ADVANCED
 TELEPHONY CONSULTANTS, MRZ
 MANAGEMENT, LLC, DONOR
 RELATIONS, LLC, TPFE, INC., AMERICAN
 TECHNOLOGY SERVICES, COMPLIANCE
 CONSULTANTS, CHROME BUILDERS
 CONSTRUCTION, INC., and UNIFIED
 DATA SERVICES,

Plaintiffs,

v.

BANK OF AMERICA, N.A., and JOHN and
 JANE DOES 1-100,

Defendants.

Case No.: 2:18-cv-01919-RFB-BNW

**STIPULATION AND ORDER TO
 EXTEND TIME TO FILE RESPONSE
 TO AND REPLY IN SUPPORT OF
 PLAINTIFFS' REFILED SECOND
 MOTION TO COMPEL DISCOVERY
 AND FOR SANCTIONS**

(FIRST REQUEST)

Pursuant to Local Rules IA 6-1, 7-1, and 7-2, Plaintiffs Richard Zeitlin; Advanced
 Telephony Consultants; MRZ Management, LLC; Donor Relations, LLC; TPFE, Inc.; American
 Technology Services; Compliance Consultants; Chrome Builders Construction, Inc.; and Unified
 Data Services (the "Plaintiffs") and Defendant Bank of America, N.A. ("BANA"), by and
 through their respective undersigned counsel of record, submit this Stipulation and Proposed
 Order for a 2-week extension of BANA's deadline to file its response to Plaintiffs' Refiled
 Second Motion to Compel Discovery and For Sanctions (ECF No. 151) (the "Motion"). The

1 Motion was filed on August 4, 2021, under seal, and is set for hearing on September 28, 2021.
 2 The Parties request an extension from August 18, 2021, BANA's current deadline to respond, to
 3 September 1, 2021.

4 The Parties also request that the deadline for Plaintiffs to file a reply in support of their
 5 Motion be extended to September 15, 2021. Plaintiffs' deadline to file a reply is currently seven
 6 days after BANA files its response.

7 This is the Parties' first request for an extension of the briefing deadlines for the Motion
 8 and is not intended to cause any delay or prejudice to any party. The reason for the extension is to
 9 give the Parties time to evaluate and respond to the arguments set forth in the Motion and
 10 BANA's response to the Motion.

11 IT IS HEREBY STIPULATED AND AGREED by and between the Parties that the time
 12 for BANA to file their response to the Motion is extended to and through September 1, 2021 and
 13 the time for Plaintiffs to file their reply in support of the Motion is extended to and through
 14 September 15, 2021.

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IT IS SO ORDERED

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DATED: August 09, 2021

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BRENDA WEKSLER

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UNITED STATES MAGISTRATE JUDGE

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1 **IT IS SO STIPULATED.**

2 Dated: August 5, 2021

Dated: August 5, 2021

3 THE BERNHOFT LAW FIRM, S.C.

SNELL & WILMER L.L.P.

4 /s/ Daniel James Treuden

/s/ Holly E. Cheong

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